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Counsel for Plaintiff

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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AC2T, Inc., d/b/a Spartan Mosquito,	:	
	:	Civil Action
Plaintiff,	:	Case No. 2:19-cv-05946-RBS
	:	
v.	:	
	:	
Colin Purrington,	:	
	:	
Defendant.	:	

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**PLAINTIFF'S SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS**

15. All communications you made to or received from any attorney or law firm (other than your own counsel), including without limitation to Burser & Fisher, P.A. and Yitzchak Kopel, Esq., concerning AC2T, Inc., Spartan Mosquito, Jeremy Hirsch, or the product at issue in this case.

16. All communications you made to or received from the Mosquito Illness Alliance or Sharon Simms concerning AC2T, Inc., Spartan Mosquito, Jeremy Hirsch, or the product at issue in this case.

17. All communications you made to or received from the Mississippi Department of Health or Wendy Varnado concerning AC2T, Inc., Spartan Mosquito, Jeremy Hirsch, or the product at issue in this case.

18. All documentation reflecting whether you have received compensation from any person or entity with respect to your statements about mosquito control products.

19. All communications (including without limitation e-mails, letters, flyers or social media posts) you made to or received from any distributor, reseller or retailer of Spartan Mosquito products concerning AC2T, Inc., Spartan Mosquito, Jeremy Hirsch, or the products of Spartan Mosquito.

20. Provide a list of any and all companies, corporations, trusts, individuals, relatives, or other person or entity from whom you have received compensation or consideration directly or indirectly in the last five (5) years in exchange for evaluating any pest control product or making any public statement about any pest control product or pest control company, including without limitation any payments made to you or to a trust, account, fund, entity or banking institution on your behalf along with a description of the services you provided in exchange for this compensation or consideration.

Respectfully submitted,

/s/ Evan L. Frank  
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